UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-CR-20104-BECERRA

UNITED STATES OF AMERICA

v.

ARCANGEL PRETEL ORTIZ, et al.,

Defendants.

UNITED STATES' NOTICE REGARDING COMPLIANCE WITH RULE 15 DEPOSITION ORDER

The United States hereby provides an update on the progress made in furtherance of the Court's May 22, 2025, order, which granted, in part, the Defendants' motion to take the Rule 15 video depositions of Naiser Franco Castaneda, Juan Carlos Yepes Clavijo, Victor Albeiro Pineda Cardona, Carlos Giovanni Guerrero Torres, and Edwin Blanquicet. (DE 1088).

The same day as the May 19, 2025, hearing, during which the Court orally granted, in part, the Defendants' Rule 15 motion, the government trial team began notifying the necessary U.S. government personnel about the Court's order, which culminated in the preparation of a diplomatic note for transmission to Haiti. While the government trial team provided input on the contents of the diplomatic note, including the general parameters of the ordered video depositions (*i.e.*, names of deponents, time frame, and necessary logistics) the note itself was prepared by U.S. State Department personnel. The diplomatic note was finalized, translated, and transmitted to the Haitian government on May 30, 2025. As of today, the U.S. government has not yet received a response from the Haitian government.

[No further information on this page.]

The government trial team will continue to provide relevant updates as it works to comply with the Court's order.

Respectfully submitted,

HAYDEN P. O'BYRNE SUE J. BAI

United States Attorney Supervisory Official for the National

Security Division

By: /s Sean T. McLaughlin

Sean T. McLaughlin

Assistant United States Attorney

Court ID No. A5501121

11200 NW 20th Street, Suite 101

Miami, FL 33172 (305) 715-7642/7654

Sean.McLaughlin@usdoj.gov

/s Andrew Briggs

Andrew Briggs

Trial Attorney

Court ID No. A5503251

National Security Division – Department of Justice

950 Pennsylvania Avenue Washington, DC 20530

(202) 514-7739

Andrew.Briggs2@usdoj.gov

/s Jason Wu

Jason Wu

Assistant United States Attorney

ID No. A5502299

99 NE 4th Street

Miami, FL 33132

(305) 961-9226

Jason.Wu@usdoj.gov

/s Altanese Phenelus

Altanese Phenelus

Assistant United States Attorney

FL Bar No. 112693

99 N.E. 4th Street

Miami, FL 33132

(305) 961-9375

altanese.phenelus@usdoj.gov

Certificate of Service

I hereby certify that on June 6, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and thereby served all counsel of record.

/s Andrew Briggs Andrew Briggs Trial Attorney